

9/5/2006
Mr. Oscar Hernandez, Director
Risk Assessment Division
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

RECEIVED
07 JUL -2 PM 1:55

Re: Trixylenyl Phosphate

Dear Mr. Hernandez:

Recently I was checking this chemical on your HPV website and found out that the updated robust summary submitted in June 2004 is not there. Supresta LLC (formerly known as Akzo Nobel Functional Chemicals LLC) is very pleased to submit again the enclosed Robust Summary Dossier for trixylenyl phosphate (CAS No. 25155-32-1) in fulfillment of its commitment to the High Production Volume Challenge Program for this material. The original robust summaries for trixylenyl phosphate, first submitted to you in September, 2001, have been extensively revised and expanded, with additional robust summaries added.

The trixylenyl phosphate test plan required the conduct of ten GLP compliant tests, namely the determination of water solubility, photodegradation, hydrolysis, biodegradation, acute toxicity to fish, aquatic invertebrates and aquatic plants, genetic toxicity (2), general repeated dose toxicity, and reproductive/developmental toxicity. Supresta is pleased to report that all ten tests have been completed and a robust summary for each of these tests has been included in the enclosed document. The Agency's letter of October 14, 1999, emphasizes the need to minimize the use of animals through the evaluation of multiple endpoints in a single test. We strongly support this policy and have conducted a test in compliance with OECD Guideline 422 which combines the determination of subchronic (repeated dose) toxicity, reproductive toxicity, and developmental toxicity. To further minimize the use of animals, the two genetic toxicity tests were conducted in vitro, in cell systems, rather than in living animals.

Supresta has reviewed the Agency's comments received in May, 2002, on the initial set of trixylenyl phosphate robust summaries, and has revised and expanded many of the summaries as recommended by the Agency. In addition, other changes and enhancements have been made to the summaries independent of the Agency's comments. We are thus very pleased to submit, herein, the final set of robust summaries to complete its commitment to the High Production Volume Challenge Program.

We appreciate the opportunity to participate in the program.

Sincerely yours,

Andy Wang, Ph.D.
Manager, Regulatory Affairs

cc: Mark Buczek

ardsley park
420 saw mill river road
ardsley, NY 10502
914 269 5900
fax 914 674 9736
www.supresta.com